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January 28, 2019

VIA ECF

Hon. Lorna Schofield
U.S. District Judge
United States District Court for the Southern
District of New York
500 Pearl Street
New York, NY 10007

Re: *Gutierrez et al. v. Tina Nails 2015, Inc. et al.*, No. 18-cv-00889

Dear Judge Schofield:

Counsel for both parties in the above captioned case submit this joint status letter pursuant to the Court's civil case management plan and scheduling order dated September 13, 2018 (ECF No. 37).

Discovery Completed

Fact discovery in this case has been completed. The depositions of defendant Mike Jhin and plaintiff Mishelle Gutierrez have been completed. There are no outstanding requests for document production. No documents have been exchanged.

Procedural History

The complaint in this case was filed on February 1, 2018. A settlement conference was ordered on May 30, 2018 and held before U.S. Magistrate Judge Barbara C. Moses on August 8, 2018. The parties were unable to resolve the dispute at the settlement conference. Defendant

quinn emanuel urquhart & sullivan, llp

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Mike Jhin filed an answer to the complaint on October 9, 2018. On December 6, 2018, Anthony P. Marzocca of Quinn Emanuel Urquhart & Sullivan, LLP filed a notice of appearance to represent defendant Mike Jhin as pro bono counsel for the limited purpose of taking and defending noticed depositions. The plaintiff has requested trial by jury in this case.

The parties acknowledge that the pre-motion conference has been rescheduled for February 7, 2019 at 10:30 am.

Defendant Mike Jhin anticipates filing a motion for summary judgment and will file the required pre-motion letter promptly.

Respectfully submitted,

/s/ Anthony P. Marzocca

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